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18 Attorneys for United States of America

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22
23 UNITED STATES OF AMERICA,) CR 24-00152 WHO
24 Plaintiff,)
25 v.) UNITED STATES' OPPOSITION TO
26 CSABA JOHN CSUKÁS,) DEFENDANT'S MOTION TO LIMIT VICTIM
27 Defendant.) TESTIMONY (ECF NO. 95)
28) Trial: October 28, 2024
29) Court: Honorable William H. Orrick
30)
31)

32 Counsel for the United States of America (the “government”), through Assistant U.S. Attorney
33 Colin Sampson and Trial Attorney Lia Rettammel, respectfully submit the following Opposition to
34 Defendant’s Motion Preclude the Jewish and Israeli victim of the alleged hate crime, S.B., from using the
35 word “Holocaust” during his trial testimony.

36 Defendant’s reposts to the Public on Reddit, as well as the speakers in videos Defendant shared on
37

38 UNITED STATES OPPOSITION,
39 CR-24-00152 WHO

1 Reddit in mid-October 2023, refer to Israel's "genocide" in Gaza. Exhibit 79, 81. Another video
2 Defendant shared publicly refers to Israel wanting to "concentrate" Palestinians. Exhibit 82. In
3 Defendant's own words, Israel imposed a "police state" and "locked up entire communities" and that
4 "Israel is perpetuating an apartheid regime and system upon the Palestinians." These words are coming
5 into the trial. The evidence will show that, as Defendant prepared to punch S.B. in the face, he said "Fuck
6 Jews! Fuck Israelis!"

7 But Defendant is deeply concerned that his alleged victim – which occurred because of his status
8 as a Jew and an Israeli – might mention the word "Holocaust" when testifying about his name. The
9 victim's name was the only piece of information Defendant had about him which identified him as being
10 affiliated with Israel or Judaism, hence Defendant's alleged questions that preceded the assault. The
11 victim's name came from his uncle, and before that his great-grandfather, who was killed in the Holocaust
12 that preceded the formation of the nation he was born to and which formed the basis of the hate crime.

13 This issue is not new, and the government did not "plant" references to S.B.'s roots. S.B. has
14 spoken at nearly every meeting with the government about his name and what it has meant to him.
15 Defendant has been aware of this since the first discovery production in March, and only raises it on the
16 eve of trial.

17 Defendant attacked the victim because he was Jewish and Israeli. He took his victim as he found
18 him. For the reasons stated above, the government opposes Defendant's Motion *in Limine*.

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20 Respectfully submitted,

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22 ISMAIL J. RAMSEY
United States Attorney

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Dated: October 25, 2024.

24 /s/ Colin Sampson
25 COLIN SAMPSON
Assistant United States Attorney
LIA RETTAMMEL
Trial Attorney, Civil Rights Division

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